## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

HERA WIRELESS S.A. and SISVEL UK LIMITED,

Plaintiffs,

V.

ARRIS GROUP, INC.,

Defendant.

HERA WIRELESS S.A. and SISVEL UK LIMITED,

Plaintiffs,

V.

BELKIN INTERNATIONAL, INC.,

Defendant.

HERA WIRELESS S.A. and SISVEL UK LIMITED,

Plaintiffs,

V.

NETGEAR, INC.,

Defendant.

HERA WIRELESS S.A. and SISVEL UK LIMITED,

Plaintiffs,

V.

ROKU, INC.,

Defendant.

Civil Action No. 17-948-RGA

JURY TRIAL DEMANDED

Civil Action No. 17-949-RGA

JURY TRIAL DEMANDED

Civil Action No. 17-951-RGA

**JURY TRIAL DEMANDED** 

Civil Action No. 17-952-RGA

JURY TRIAL DEMANDED

HERA WIRELESS S.A. and SISVEL UK LIMITED,

Plaintiffs,

V.

LENOVO HOLDING COMPANY, INC.; and LENOVO (UNITED STATES), INC.,

Defendants.

Civil Action No. 17-1088-RGA
JURY TRIAL DEMANDED

### JOINT CLAIM CONSTRUCTION APPENDIX

Pursuant to Paragraph 9 of the Court's Scheduling Order, Plaintiffs Hera Wireless S.A. and Sisvel UK Limited ("Sisvel"), and Defendant ARRIS Group, Inc., Defendant Belkin International, Inc., Defendant NETGEAR, Inc., Defendant Roku, Inc., Defendants Lenovo Holding Company, Inc. and Lenovo (United States), Inc. (collectively "Defendants") jointly submit the attached joint claim construction appendix.

## TABLE OF CONTENTS FOR JOINT APPENDIX

<u>Exhibit</u>	
U.S. Patent No. 7,962,103	A
U.S. Patent No. 8,412,115	В
U.S. Patent No. 8,934,851	C
U.S. Patent No. 9,270,024	D
U.S. Patent No. 7,369,878	E
U.S. Patent No. 7,454,234	F
U.S. Patent No. 7,873,389	G
U.S. Patent No. 8,295,400	Н
U.S. Patent No. 8,737,377	I
June 28, 2010 Office Action from the Prosecution History of U.S. Patent No. 7,962,103	J
December 23, 2013 Office Action from the Prosecution History of the '377 patent	K
February 15, 2007 Applicant Response to Office Action from the Prosecution History of U.S. Patent No. 7,539,461	L
April 26, 2007 Applicant Response to Office Action from the Prosecution History of U.S. Patent No. 7,539,461	M
July 21, 2006 Applicant Response to Office Action from the Prosecution History of U.S. Patent No. 7,539,461	N
August 24, 2007 Applicant Response to Office Action from the Prosecution History of U.S. Patent No. 7,539,461	O
Pre-appeal Brief Request for Review filed on September 22, 2004 from Prosecution History of U.S. Patent No. 7,539,461	P
U.S. Patent No. 6,859,503	Q
U.S. Patent No. 6,901,062	R
IPR2018-01738 Petition for Inter Partes Review of U.S. Patent No. 7,369,878	S

IPR2018-01738 Exhibit 1002	T
IEEE 100 The Authoritative Dictionary of IEEE Standards Terms (7th Edition, 2000)	U
March 26, 2010 Office Action from the Prosecution History of U.S. Patent No. 7,962,103	V
The Oxford English Dictionary, Volume XII, J.A. Simpson and E.S.C Weiner (1989)	W
May 2, 2011 Applicant Response to Office Action from the Prosecution History of U.S. Patent No. 8,412,115	X
March 6, 2013 Applicant Response to Office Action from the Prosecution History of U.S. Patent No. 8,934,851	Y
Expert Declaration of Jack Winters, PhD	AA
Official Transcript for December 28, 2018 Deposition of Jack Winters, Ph.D	BB
Excerpt from Merriam-Webster's Collegiate Dictionary (11th Edition, 2004)	CC
Preliminary Analysis of Infringement of U.S. Patent No. 7,962,103 by Hera Wireless S.A. and Sisvel UK Limited	DD

Dated: February 5, 2019

#### DEVLIN LAW FIRM LLC

### /s/ Timothy Devlin

Timothy Devlin (No. 4241) tdevlin@devlinlawfirm.com 1306 N. Broom Street, 1st Floor Wilmington, DE 19806 (302) 449-9010

Attorneys for Plaintiffs Hera Wireless S.A. and Sisvel UK Limited

#### **DUANE MORRIS LLP**

### /s/ Richard L. Renck

Richard L. Renck (I.D. No. 3893) 222 Delaware Avenue, Suite 1600 Wilmington, DE 19801 Tel: (302) 657-4900

Fax: (302) 657-4901

rlrenck@duanemorris.com

Attorneys for Defendants

ARRIS Group, Inc.; and Belkin International, Inc.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

### /s/ Jennifer Ying

Jack B. Blumenfeld (#1014) Jennifer Ying (#5550) 1201 North Market Street P.O. Box 1347 Wilmington, DE 19899 (302) 658-9200 jblumenfeld@mnat.com jying@mnat.com

Attorneys for Defendants Lenovo Holding Company, Inc. and Lenovo (United States), Inc. ASHBY & GEDDES

### /s/ Steven J. Balick

Steven J. Balick (#2114) Andrew C. Mayo (#5207) 500 Delaware Avenue, 8th Floor P.O. Box 1150 Wilmington, DE 19899 (302) 654-1888 sbalick@ashbygeddes.com amayo@ashbygeddes.com

Attorneys for Defendants NETGEAR, Inc.; and Roku, Inc.

# **CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via electronic filing on February 5, 2019.

/s/ Timothy Devlin
Timothy Devlin